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William M. O'Connor
(212) 895-4259
woconnor@crowell.com

July 14, 2009

BY FACSIMILE to (212) 805-6382
Hon. Victor Marrero
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: ***Anwar, et al. v. Fairfield Greenwich Limited, et al.*,**
09-CV-118 (VM) (THK)

Dear Judge Marrero:

This firm represents the plaintiffs in the action styled *Bhatia, et al. v. Standard Chartered (USA) Ltd., et al.*, which has been administratively consolidated with the above-referenced *Anwar* action. For the reasons set forth herein, we request an extension of time of 120 days to serve process upon the defendants in *Bhatia* which have not yet been served.

The *Bhatia* action was commenced on March 16, 2009, with the filing of the complaint. Shortly thereafter, we entered into discussions with counsel for the *Bhatia* defendants regarding their acceptance of service of process and an extension of time to respond to the complaint. The *Bhatia* defendants, including Fairfield Greenwich Limited and the other Fairfield Defendants (as defined in the *Bhatia* complaint), requested that we coordinate the response time with the *Anwar* action.

At a telephone conference held on May 4, 2009, the Court decided that *Bhatia* would be administratively consolidated with *Anwar* for pre-trial purposes. We inquired about whether the *Bhatia* complaint would remain separate, and you advised us to work out this issue with the parties.

We have conferred with counsel for the *Anwar* plaintiffs and it is our understanding that they intend to file a Second Consolidated Amended Complaint, and while the *Anwar* plaintiffs reserve the right to bring class claims against the Standard Chartered Defendants (as defined in the *Bhatia* complaint), the claims of the *Bhatia* plaintiffs will not be incorporated into the Second Consolidated Amended Complaint or any subsequently filed consolidated amended complaint.

In turn, we conferred with the Standard Chartered Defendants, who are amenable to proceeding as we have agreed with the *Anwar* plaintiffs, with separate complaints.

We have not yet reached an agreement with the Fairfield Defendants regarding retaining a separate complaint. We have spoken with counsel for the Fairfield Defendants as recently as today, and should we be unable to reach a resolution within a week, we will seek the Court's determination on this issue.

Because we have not yet confirmed that the *Bhatia* complaint will remain separate from *Anwar*, we have not yet reached agreements regarding acceptance of service of the *Bhatia* complaint and the appropriate response time. Accordingly, we respectfully request an extension of time of 120 days to serve process upon the Fairfield Defendants.

Very truly yours,

William M. O'Connor

cc: Counsel for all parties (by email)

Request GRANTED. The time for the plaintiffs in the Bhatia portion of this litigation to serve process upon the defendants in the Fairfield part is extended by 120 days from the date of the current deadline.

SO ORDERED:

7-15-09

DATE

VICTOR MARRERO, U.S.D.J.